

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF FLORIDA**

PAVEL SOLOVEV,

Plaintiff,

Case No: 0:23-CV-62179-JB

vs.

TRAVELWORKS, INC. et al.,

Defendants.

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**NOTICE OF VOLUNTARY DISMISSAL PURSUANT TO F.R.C.P. 41(a)(1)(A)(i)**

Pursuant to F.R.C.P. 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, the plaintiff, PAVEL SOLOVEV, by and through his undersigned counsel, hereby give notice that the above-captioned action is voluntarily dismissed against ALL DEFENDANTS. ]

MEMORANDUM OF LAW

F.R.C.P. 41(a)(1)(A)(i) allows the dismissal of a Defendant without a Court Order before an opposing party serves either an answer or a motion for summary judgment. Here, the Defendants did not file any answer, nor did they file a motion for summary judgment. As such, the dismissal can be accomplished without Court Order.

Dated: November 29, 2024

**WHEREFORE**, Plaintiff is entitled to a Default Judgment under the Federal Rules of Civil Procedure.

Respectfully submitted,

By:

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/s/ Andre G. Raikhelson  
Andre G. Raikhelson, Esq.  
Florida Bar Number: 123657

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**CERTIFICATE OF SERVICE**

I hereby certify that I have served all counsel of record through the federal efilng system on April 19, 2024.

/s/ Andre G. Raikhelson  
Andre G. Raikhelson, Esq